

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**VENABLE LLP**

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*Counsel to Interested Parties Cipher Mining Inc. and  
Cipher Mining Technologies Inc.*

In Re:

BLOCKFI INC., et al.,

Debtors.

Case No.: 22-19361-MBK

Chapter: 11

(Jointly Administered)

Judge: Hon. Michael B. Kaplan

**MOTION FOR AN ORDER PERMITTING TERMINATION AND WITHDRAWAL OF  
INTERESTED PARTIES CIPHER MINING INC. AND CIPHER MINING  
TECHNOLOGIES INC. AND THEIR COUNSEL**

The undersigned hereby respectfully requests an Order granting the withdrawal and termination from this bankruptcy case of (1) Interested Parties Cipher Mining Inc. and Cipher Mining Technologies Inc. (together, "Cipher") and (2) their attorneys at Venable LLP, including

Michael A. Guerra, Jeffrey S. Sabin, Carol A. Weiner, and Andrew J. Currie, the latter three of which were admitted *pro hac vice*.

In support of its Motion, Cipher states as follows:

The totality of Cipher's appearances in this case include: On January 26, 2023, Michael A. Guerra, of the law firm Venable LLP entered an appearance in the bankruptcy proceeding captioned above on behalf of Cipher. ECF Doc. Nos. 409 and 422. Subsequently, on behalf of Cipher, Mr. Guerra filed motions on January 26, 2023, seeking the *pro hac vice* admission of Venable LLP attorneys Jeffrey S. Sabin, Carol A. Weiner, and Andrew J. Currie. ECF Doc. Nos. 410, 411, 413, and 422. This Court granted those motions on February 3, 2023. ECF Doc. Nos. 465, 466, and 467.

Cipher's interests in this bankruptcy proceeding ended before mid-2023, and as a result, Venable LLP's representation of Cipher in connection with this proceeding similarly concluded around then as well.

Cipher has consented to this Motion and the relief sought herein.

This Motion is submitted pursuant to Local Bankruptcy Rule 9010-2(b) of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (as of August 1, 2023) ("Unless another attorney is substituted, an attorney may not withdraw an appearance except by permission of court."), and the Court's inherent and discretionary power to manage its dockets and the cases before it, *see, e.g., Rios v. Shafer (In re Shafer)*, Civil Nos. 09-3575; 09-4254 (JBS), 2009 WL 3334877 (D.N.J. Oct. 14, 2009). A proposed form of Order granting the relief requested is submitted with this Motion as **Exhibit A**.

**WHEREFORE**, Cipher requests that the Court enter an Order, substantially in conformity with the enclosed form Order (Ex. A), granting the termination and withdrawal from

the bankruptcy proceedings captioned above of (1) Cipher and (2) Cipher's undersigned counsel at Venable LLP, and such other and further relief as the Court may deem just and proper.

Dated: January 25, 2024  
New York, New York

**VENABLE LLP**

By: /s/ Michael A. Guerra  
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